

Response deadline: November 11, 2006  
4:00 p.m. EST  
Hearing date and time: November 30, 2006  
10:00 a.m. EST

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

DELPHI CORP. *et al.*,

Debtors.

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)  
) Chapter 11  
)  
) Case No. 05-44481 (RDD)  
)  
) (Jointly Administered)  
)

**NOTICE OF MOTION OF CREDITORS/INTERESTED PARTIES JOHN BLAHNIK,  
PAUL FREE, MILAN BELANS, LAURA MARION,  
PETER JANAK, AND CATHY ROZANSKI TO MODIFY OCTOBER 13, 2005,  
ORDER, AND TO COMPEL DELPHI CORPORATION  
TO ADVANCE LEGAL FEES AND COSTS**

**PLEASE TAKE NOTICE** that John Blahnik, Paul Free, Milan Belans, Laura Marion, Peter Janak, and Cathy Rozanski (collectively, “Movants”) have filed a motion (the “Motion”) to modify the Bankruptcy Court’s October 13, 2005 Order Under 11 U.S.C. §§ 105(a), 363, 507, 1107, and 1108 (I) Authorizing Debtors to Pay Prepetition Wages and Salaries to Employees and Independent Contractors; (II) Authorizing Debtors to Pay Prepetition Benefits and Continue Maintenance of Human Capital Benefit Programs in the Ordinary Course; and (III) Directing Banks to Honor Prepetition Checks for Payment of Prepetition Human Capital Obligations, wherein Movants request that the Court amend its October 13, 2005 Order and compel Delphi Corporation to comply with the provisions of its Amended and Restated Bylaws with respect to indemnification and advancement.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Hearing”) will be held in connection with the entry of an Order granting the relief requested in Movants’ Motion and any further relief, on **November 30, 2006, at 10:00 a.m., prevailing Eastern Time**, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the “Court”), Alexander Hamilton Custom House, Room 610, One Bowling Green, New York, NY 10004.

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to Movants’ Motion shall be in writing, shall state with particularity the reasons for the objection or response, and shall be filed with the Court and shall be served upon counsel for Movants as listed below, so as to be *received* by **November 11, 2006 at 4 p.m.** Only those objections which have been timely filed and served may be considered by the Court at the Hearing.

**[remainder of page intentionally left blank]**

Dated: October 19, 2006

Respectfully submitted,

/s/ Richard A. Rossman

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